

Lexi J. Hazam (SBN 224457)
lhazam@lchb.com
 LIEFF CABRASER HEIMANN
 & BERNSTEIN, LLP
 275 Battery Street, 29th Floor
 San Francisco, CA 94111-3339
 Telephone: (415) 956-1000

Previn Warren (*pro hac vice*)
pwarren@motleyrice.com
 MOTLEY RICE LLC
 401 9th Street NW, Suite 630
 Washington, DC 20004
 Telephone: (202) 386-9610

Plaintiffs' Co-Lead Counsel

Jennie Lee Anderson (SBN 203586)
jennie@andrusanderson.com
 ANDRUS ANDERSON LLP
 155 Montgomery Street, Suite 900
 San Francisco, CA 94104
 Telephone: (415) 986-1400

Plaintiffs' Liaison Counsel

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT
 ADDICTION/PERSONAL INJURY
 PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

R.B. and A.B. v. Snap Inc., 4:24-cv-04083;

K.G. and N.F. v. Snap Inc., et al., 4:24-cv-04086;

K.K. and K.A. v. Meta Platforms, Inc. et al., 4:24-cv-04425;

K.K. and C.K. v. Meta Platforms, Inc. et al., 4:24-cv-04426;

C.S., filed on behalf of minor T.P. v. Meta Platforms, Inc. et al., 4:24-cv-04495;

M.M., filed on behalf of minor A.B. v. Meta Platforms, Inc., et al., 4:24-cv-04578;

K.N., filed on behalf of minor A.N. v. Meta Platforms, Inc., et al., 4:24-cv-05161;

S.C., filed on behalf of minor D.G. v. Meta Platforms, Inc., et al., 4:24-cv-05178;

C.C., filed on behalf of minor L.C. v. Meta Platforms, Inc., et al., 4:24-cv-05369;

**ADMINISTRATIVE MOTION TO FILE
 UNDER SEAL EXHIBITS TO THE
 DECLARATION OF JENNIE LEE
 ANDERSON IN SUPPORT OF PLAINTIFFS'
 ELEVENTH CONSOLIDATED *EX PARTE*
 APPLICATION FOR APPOINTMENT OF
 GUARDIANS *AD LITEM***

1 *C.D., on behalf of C.F. v. Meta Platforms,*
 2 *Inc. et al., 4:24-cv-06506;*

3 *J.H., filed on behalf of minor M.H. v. Meta*
 4 *Platforms, Inc., et al., 4:24-cv-06613;*

5 *B.B., filed on behalf of minor O.B. v. Meta*
 6 *Platforms, Inc., 4:24-cv-06139;*

7 *L.J. and B.J. v. Meta Platforms, Inc. et al.,*
 8 *4:24-cv-06722;*

9 *J.G., individually and on behalf of Z.J. v.*
 10 *Meta Platforms, Inc. et al., 4:24-cv-06723;*

11 *B.D., on behalf of Z.H. v. Meta Platforms,*
 12 *Inc. et al., 4:24-cv-06727;*

13 *D.C., on behalf of T.S. v. Meta Platforms,*
 14 *Inc. et al., 4:24-cv-06728;*

15 *D.C. and E.B v. Snap Inc. et al., 4:24-cv-*
 16 *06729;*

17 *R.Z., filed on behalf of minor C.Z. v. Meta*
 18 *Platforms, Inc. et al., 4:24-cv-06641.*

19 Pursuant to Civil Local Rules 7-11 and 79-5(c), Plaintiffs respectfully move for
 20 administrative relief to file under seal the individual *Ex Parte* Applications for Appointment of
 21 Guardians *Ad Litem* (“Applications”) described in Plaintiffs’ Eleventh Consolidated *Ex Parte*
 22 Application for Appointment of Guardians *Ad Litem* (“*Ex Parte* Application”) and attached as
 23 Exhibits 1-18 to the Declaration of Jennie Lee Anderson in Support of Plaintiffs’ Eleventh
 24 Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* (“Anderson
 25 Declaration”).

26 The Applications for which sealing is sought are:

- 27 • *R.B. and A.B. v. Snap Inc., 4:24-cv-04083* (Exhibit 1)
- 28 • *K.G. and N.F. v. Snap Inc., et al., 4:24-cv-04086* (Exhibit 2);
- *K.K. and K.A. v. Meta Platforms, Inc. et al., 4:24-cv-04425* (Exhibit 3);
- *K.K. and C.K. v. Meta Platforms, Inc. et al., 4:24-cv-04426* (Exhibit 4);
- *C.S., filed on behalf of minor T.P. v. Meta Platforms, Inc. et al., 4:24-cv-04495*
 (Exhibit 5);

- 1 • *M.M., filed on behalf of minor A.B. v. Meta Platforms, Inc., et al.*, 4:24-cv-04578
2 (Exhibit 6);
- 3 • *K.N., filed on behalf of minor A.N. v. Meta Platforms, Inc., et al.*, 4:24-cv-05161
4 (Exhibit 7);
- 5 • *S.C., filed on behalf of minor D.G. v. Meta Platforms, Inc., et al.*, 4:24-cv-05178
6 (Exhibit 8);
- 7 • *C.C., filed on behalf of minor L.C. v. Meta Platforms, Inc., et al.*, 4:24-cv-05369
8 (Exhibit 9);
- 9 • *C.D., on behalf of C.F. v. Meta Platforms, Inc. et al.*, 4:24-cv-06506 (Exhibit 10);
- 10 • *J.H., filed on behalf of minor M.H. v. Meta Platforms, Inc., et al.*, 4:24-cv-06613
11 (Exhibit 11);
- 12 • *B.B., filed on behalf of minor O.B. v. Meta Platforms, Inc.*, 4:24-cv-06139 (Exhibit 12);
- 13 • *L.J. and B.J. v. Meta Platforms, Inc. et al.*, 4:24-cv-06722 (Exhibit 13);
- 14 • *J.G., individually and on behalf of Z.J. v. Meta Platforms, Inc. et al.*, 4:24-cv-06723
15 (Exhibit 14);
- 16 • *B.D., on behalf of Z.H. v. Meta Platforms, Inc. et al.*, 4:24-cv-06727 (Exhibit 15);
- 17 • *D.C., on behalf of T.S. v. Meta Platforms, Inc. et al.*, 4:24-cv-06728 (Exhibit 16);
- 18 • *D.C., and E.B v. Snap Inc. et al.*, 4:24-cv-06729 (Exhibit 17);
- 19 • *R.Z., filed on behalf of minor C.Z. v. Meta Platforms, Inc. et al.*, 4:24-cv-06641
20 (Exhibit 18).

21 This motion is accompanied by a [Proposed] Order and the Declaration of Jennie Lee
22 Anderson in Support of Plaintiffs' Administrative Motion to File Under Seal Exhibits to the
23 Declaration of Jennie Lee Anderson in Support of Plaintiffs' Eleventh Consolidated *Ex Parte*
24 Application for Appointment of Guardians *Ad Litem* ("Anderson Decl. ISO Admin Motion"),
25 pursuant to Civil Local Rules 7-11 and 7-12. *See* Civ. L. R. 79-5(c).

26 This Court previously considered and finding good cause granted Plaintiffs' request to
27 seal applications for guardian *ad litem* in this case. ECF No. 16.

28 Pursuant to Civil Local Rule 7-11, Liaison Counsel for Plaintiffs asked Defendants for a

standing stipulation that Applications may be filed under seal. Liaison Counsel for Defendants confirmed that Defendants will so stipulate, but do not waive, and expressly reserve, their right to seek an order or orders in the future to unseal individual applications and/or require parents who wish to proceed pseudonymously going forward make a showing of good cause. Anderson Decl. ISO Admin. Mot. to Seal, ¶5.

For the reasons set forth above, Plaintiffs respectfully request that the Court enter the [Proposed] Order Granting Plaintiffs' Administrative Motion to File Under Seal Exhibits in Support of Plaintiffs' Eleventh *Ex Parte* Application for Appointment of Guardians *Ad Litem*.

Dated: October 25, 2024

Respectfully submitted,

ANDRUS ANDERSON LLP

/s/ Jennie Lee Anderson

Jennie Lee Anderson (SBN 203586)

jennie@andrusanderson.com

ANDRUS ANDERSON LLP

155 Montgomery Street, Suite 900

San Francisco, CA 94104

Telephone: (415) 986-1400

Plaintiffs' Liaison Counsel

Lexi J. Hazam (SBN 224457)

lhazam@lchb.com

**LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP**

275 Battery Street, 29th Floor

San Francisco, CA 94111-3339

Telephone: (415) 956-1000

Facsimile: (415) 956-100

Previn Warren (*pro hac vice*)

pwarren@motleyrice.com

MOTLEY RICE LLC

401 9th Street NW, Suite 630

Washington, DC 20004

Telephone: (202) 386-9610

Facsimile: (202) 232-5513

Plaintiffs' Co-Lead Counsel

Christopher A. Seeger (*pro hac vice*)

SEEGER WEISS, LLP

55 Challenger Road, 6th Floor

1 Ridgefield Park, NJ 07660
2 Telephone: (973) 639-9100
3 Facsimile: (973) 679-8656
4 cseeger@seegerweiss.com

5 ***Counsel to the Co-Lead Counsel and Settlement***
6 ***Counsel***

7 JOSEPH G. VANZANDT
8 **BEASLEY ALLEN CROW METHVIN**
9 **PORTIS & MILES, P.C.**
10 234 COMMERCE STREET
11 MONTGOMERY, AL 36103
12 Telephone: 334-269-2343
13 joseph.vanzandt@beasleyallen.com

14 EMILY C. JEFFCOTT
15 **MORGAN & MORGAN**
16 220 W. GARDEN STREET, 9TH FLOOR
17 PENSACOLA, FL 32502
18 Telephone: 850-316-9100
19 ejeffcott@forthepeople.com

20 ***Federal/State Liaisons***

21 MATTHEW BERGMAN
22 **SOCIAL MEDIA VICTIMS LAW CENTER**
23 821 SECOND AVENUE, SUITE 2100
24 SEATTLE, WA 98104
25 Telephone: 206-741-4862
26 matt@socialmediavictims.org

27 JAYNE CONROY
28 **SIMMONS HANLY CONROY, LLC**
112 MADISON AVE, 7TH FLOOR
NEW YORK, NY 10016
Telephone: 917-882-5522
jconroy@simmonsfirm.com

ANDRE MURA
GIBBS LAW GROUP, LLP
1111 BROADWAY, SUITE 2100
OAKLAND, CA 94607
Telephone: 510-350-9717
amm@classlawgroup.com

MICHAEL M. WEINKOWITZ
LEVIN SEDRAN & BERMAN, LLP
510 WALNUT STREET

SUITE 500
PHILADELPHIA, PA 19106
Telephone: 215-592-1500
mweinkowitz@lfsbalw.com
ALEXANDRA WALSH
WALSH LAW
1050 Connecticut Ave, NW, Suite 500
Washington D.C. 20036
Telephone: 202-780-3014
awalsh@alexwalshlaw.com

JAMES J. BILSBORROW
WEITZ & LUXENBERG, PC
700 BROADWAY
NEW YORK, NY 10003
Telephone: 212-558-5500
jbilsborrow@weitzlux.com
Plaintiffs' Steering Committee Leadership

PAIGE BOLDT
WATTS GUERRA LLP
4 Dominion Drive, Bldg. 3, Suite 100
San Antonio, TX 78257
Telephone: 210-448-0500
PBoldt@WattsGuerra.com

CARRIE GOLDBERG
C.A. GOLDBERG, PLLC
16 Court St.
Brooklyn, NY 11241
Telephone: (646) 666-8908
carrie@cagoldberglaw.com

SIN-TINY MARY LIU
**AYLSTOCK WITKIN KREIS & OVERHOLTZ,
PLLC**
17 EAST MAIN STREET, SUITE 200
PENSACOLA, FL 32502
Telephone: 510-698-9566
mliu@awkolaw.com

EMMIE PAULOS
LEVIN PAPANTONIO RAFFERTY
316 SOUTH BAYLEN STREET, SUITE 600
PENSACOLA, FL 32502
Telephone: 850-435-7107
epaulos@levinlaw.com

ROLAND TELLIS
BARON & BUDD, P.C.
15910 Ventura Boulevard, Suite 1600
Encino, CA 91436
Telephone: (818) 839-2333
rtellis@baronbudd.com

DIANDRA “FU” DEBROSSE ZIMMERMANN
DICELLO LEVITT
505 20th St North
Suite 1500
Birmingham, Alabama 35203
Telephone: 205.855.5700
fu@dicellolevitt.com

HILLARY NAPPI
HACH & ROSE LLP
112 Madison Avenue, 10th Floor
New York, New York 10016
Telephone: 212.213.8311
hnappi@hrsclaw.com

JAMES MARSH
MARSH LAW FIRM PLLC
31 HUDSON YARDS, 11TH FLOOR
NEW YORK, NY 10001-2170
Telephone: 212-372-3030
jamesmarsh@marshlaw.com

RUTH RIZKALLA
CARLSON LAW FIRM
100 E. Central Texas Expy
Killeen, TX 76541
Telephone: (254) 526-5688
RRizkalla@carlsonattorneys.com

Ron A. Austin
RON AUSTIN LAW
400 Manhattan Blvd
Harvey, LA 70058
504-227-8100
Fax: 504-227-8122
raustin@ronaustinlaw.com

Plaintiffs’ Steering Committee Membership